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ABSTRACT

The First Amendment rights provided to journalists--freedom of speech and of the press--are fundamental beliefs held by Americans. What students learn in the government class, however, may not be what they learn as editors-in-chief of student newspapers. U.S. schools are being charged with the censorship of student publications at an ever-increasing rate. A review of recent court cases shows that from editorials and articles to advertising, university administrators and even student governments are trying to censor not only student newspapers but also student-run radio stations, yearbooks, and television productions. University administrators, including presidents and student affairs officials of some universities, have removed editors of publications from office, requested review of publications prior to print, and created environments in which an editor's only recourse is to resign. Educational facilities have long been the sites of debate, and, in the past, have encouraged the questioning of the status quo. But recently, however, the tactics that those wanting to censor student newspapers have been using is to throw away copies of the paper--an offense that college administers and courts have been slow to recognize as criminal and slow to punish. (Contains 24 references.) (TB)

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Censorship and the Student Press

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The First Amendment rights provided to journalists - freedom of speech and of the press - are fundamental beliefs held by Americans. "The United States and its people are envied around the world for their freedom of expression," said Paul McMasters, executive director of the Freedom Forum First Amendment Center (*Spirited* 2). Americans teach these and other rights provided by our Constitution to high school and college students every year. Journalism education begins even earlier in this media age, where the simple push of a button can bring visual images of a reporter "on the scene" of a story. Those students who decide to make journalism their career receive their best education through student media.

What they learn as the editor-in-chief of their college newspaper, however, may not be what they learned in government class. Our nation's schools are being charged with the censorship of student publications at an ever increasing rate. Although censorship is not a new charge, the Student Press Law Center (SPLC), a resource center for student media located in Washington, DC, reports that calls about censorship and the rights of student journalists have been increasing, particularly since 1988, the year the Supreme Court ruled in *Hazelwood School District vs. Kuhlmeier*. In this ruling, the Court said that high school officials had the right to censor student expression if they could demonstrate a "legitimate pedagogical concerns" for doing so (Holweger 9-10).

Our nation's schools are being charged with the censorship of student publications at an ever increasing rate. From editorials and articles to advertising, university administrators, and even student governments, are trying to censor not only student newspapers, but also student-run radio stations, yearbooks, and television productions. University administrators, including the presidents and student affairs officials of some universities, have removed editors of publications from office, requested prior review of publications before they go to print, and created environments in which the editors' only recourse was to resign. Student governments have locked a staff out of their newspaper office, replaced editors, and threatened to and carried out the act of cutting funding to those organizations that ran stories they did not approve of.

These are not exaggerated examples. These are crimes that are going unpunished. But for every case that makes the mainstream news reports or makes it to court, there are thousands of instances of censorship across our supposedly liberal and open college campuses. That is not to say that conservative publications are facing censorship. They too are facing these issues. Although censorship is not a new charge, the Student Press Law Center (SPLC), a resource center for student media located in Washington, DC, reports that calls regarding censorship and the rights of student journalists are increasing and have been rising particularly since 1988 when the Supreme Court ruled in *Hazelwood School District v. Kuhlmeier*.

Much of the recent literature on the student press focuses on the *Hazelwood* decision and its effects, both on high schools and colleges. Although the court ruled only on high school publications, many college student journalists feared for their rights, some due to actual threats from administrators, and called the SPLC (SPLC *Hazelwood* and the College Press 1).

Historically, there has always been a struggle between the press and government, and this battle has spilled over into the microcosms of American society: colleges and high schools. The freedom of the press has always won in the main arena of the American battleground, but the *Hazelwood* decision has been trumpeted as a death knell for the student press (Salomone 48).

On the day of the *Hazelwood* decision, a student newspaper advisor at a high school in California told his principal about the increase in control administrators had received as a result of the *Hazelwood* ruling. A little over an hour later, the principal put a controversial story slated for publication in the student newspaper "on hold" while he checked into his responsibilities under the new decision (Fraser 11).

The student editors did their own checking and, on a tip from a reporter at the *San Jose Mercury News*, found that the California Education Code already contained a stipulation that student journalists were to retain editorial control of their publications prior to the *Hazelwood* ruling, making the Supreme Court ruling null and void in California.

It is important to note that Hazelwood did not overturn the 1969 Supreme Court ruling *Tinker v. Des Moines Independent Community School District*. *Tinker* had been the basis for numerous protections of the freedom of the student press in the period before *Hazelwood*. In

Tinker, the Court ruled that school officials could limit student expression only when it would substantially disrupt school activities or invade the rights of others (Fraser 11). In cases where *Hazelwood* standards are not met, *Tinker* applies. The standards of *Hazelwood* are based on the East Hazelwood High School student newspaper which was ruled "censurable" because the court determined that it was not a "public forum for expression by students" (SPLC, *Complete Guide* 2). The court found that the advisor of the Hazelwood paper had the "final authority" over everything, including content. Editorial power rested with the advisor rather than the student editors. When students have been given control - "by policy or practice" - the publication is a public forum (2). A publication must also be sponsored by the school and part of the curriculum in order for *Hazelwood* to apply, but this does not automatically guarantee administrators control.

In *Romano v. Harrington*, a New York court ruled that a newspaper produced after school with no class credit for those involved was "less limitable" than others although it received school funding. Also, in a Connecticut case, a student publication was ruled to be exempt from *Hazelwood* because historically, and in its current operation, it acted as "an independent student voice" (SPLC, *Complete Guide* 2).

Healy v. James (1972) held that the college press is a public forum for student expression (Janosik and Sina 320). In *Antonelli v. Hammond*, a Massachusetts court ruled that state colleges have no editorial control over a campus newspaper, and financial support cannot be withheld by college administrators according to *Joyner v. Whiting* (1973) due to debates about "publishing standards" (Janosik and Sina 321).

But on April 13, 1976, twelve years before the *Hazelwood* ruling, a college newspaper known as *ACME News* submitted its constitution to its Student Association as required by the S.A. bylaws in order to be recognized as a campus student organization and to receive funding. The S.A.'s Judicial Commissioner, according to an *ACME News* front page article, "assured the S.A. Senate that there was nothing wrong with ACME's constitution and that it would be ratified," (Evans et al. 1). The ratification, supposed to take place on April 26, did not occur.

Instead, on April 27, the Student Association ratified a constitution written by two other students who were not elected by the newspaper's staff. One of these students was the S.A. Business Manager and the other had made an unsuccessful bid for the editorship of *ACME News*. When the student cried foul play with the first election, a second election was held, which he also lost. And yet, on April 28, this student was ratified as editor of a new paper, and *ACME News* and its elected editorial board was dissolved as a publication and campus organization.

ACME News was the University of Hartford's student newspaper, and this example of the Student Association taking over, simply because it controls the purse strings and the ratification process, happens today, almost twenty years later. Fortunately for the University of Hartford, the S.A.'s appointed editor and newly created newspaper lasted only one semester. The spring semester of the 1976-77 school year brought about the birth of the *Informer*, the paper I ran last year, as a reaction to this power play by the student government. A school in Canada, however, has not been so lucky.

The University of British Columbia's student government, the Alma Mater Society (AMS), took over its student newspaper, the *Ubyssey*, claiming that the paper went over its allocated budget. The reasons for battle, however, are much more complex. The newspaper and the student government are on opposite sides of the political spectrum and have had numerous run-ins in the past. The takeover was based upon strategies outlined in a pamphlet that claims to have been published by the Progressive Conservative Youth Party (PCYP) in an effort to help campus conservatives stifle "leftist student organizations on Canadian campuses," (Wolper *Student government*, 12). The PCYP denies any direct involvement. One student said that Canadians are not as obsessed with free speech as Americans (39), but other examples show that we certainly are not obsessed with free speech for our students, and this Canadian example shows us what we can expect if we do not start protecting that right.

Faculty advisors often find themselves in a difficult place when censorship issues arise. On the one hand, they are there to teach the students the finer points of journalism. On the other,

their employer (the university) does not want any bad press. Bill Blanton, the former advisor for the *Marquette Tribune*, said that when the students published a series that the administration did not like, they were attacked in private meetings (Wolper, *Separating* 16). This goes on at the University of Hartford as well. Faculty members have related tales to my staff in which administrators have called our paper the "Mis-Informer." A former staff employee was a member of the judicial panel for a case in which I was a witness. The case revolved around a party on campus in an apartment that did not have a "party permit," a new requirement at the time for students who wanted to serve alcohol at their campus parties. Part of the defense was that an article in the *Informer* (truthfully) stated that both the old and new policies on parties were in effect until a certain date in order to give people a chance to attend the party classes required in order to obtain the permit. The party had occurred prior to that date. The staff member asked the students if they actually believed what they read in the *Informer* because he had heard that their methods of news gathering were "suspect" and that the news was often "made up." The students were my roommates, and at the time, I was the Features Editor of the *Informer*.

Fortunately, we do not have an advisor that could be put "in the hot seat," as it was put by Dr. Elizabeth Burt, a journalism professor at the University of Hartford and our "unofficial advisor." The journalism professor in the School of Communication is always available to us if we have questions, as is Dr. John Roderick. But the unofficial nature and the fact that we do not regularly meet with these professors keeps any pressure from the administration off of their shoulders.

This does not, however, stop the administration from pressuring the students working on the newspaper. The former editor of the *Marquette Tribune* described a meeting with the president of Marquette, saying, "He really chastised me," (Wolper, *Separating* 16). My own meetings with University of Hartford President Humphrey Tonkin could also be described as difficult. When I returned to school in August of 1994, I introduced myself to the president, and

we set up two meetings so that we could discuss issues and share information. It sounded reasonable to me at the time. But after I published two front page articles about cutbacks at Lincoln Theater, a professional arts organization run on our campus, the tone of the meetings changed.

In the first meeting, Tonkin told me about various projects that the university was working on and who would know the most about them in case I wanted to follow up. In the second meeting, he yelled at me, telling me that I had purposely slanted my story, making it a negative story when there are plenty of positives in the Lincoln Theater issue. I asked him what was positive about people, including students, losing their jobs and the fact that no bands would be playing on campus this year. His answer was that the Emerson String Quartet was going to play in Lincoln this year rather than Millard Auditorium in the Hartt School for the first time in their fifteen-year history on this campus. As for the job losses, he said that physical therapy professors were being added.

Part of the problem with administrators is that they think in terms of positive/negative trade-offs. Physical therapy professors have nothing to do with Lincoln Theater and, therefore, did not belong in that article. Students want new rock bands, not string quartets that have been on campus longer than they have. But Tonkin is thinking damage control. There are people losing their jobs and although that is negative, he tries to find that positive spin. He expected me to do the same, but that was not my job. Tonkin also said that I did not know the impact my "little paper" has. He was referring to calls he had received from the *Hartford Advocate*, a local arts publication, and other outside media. He thought I would be either surprised or upset because I had brought him all this "undue pressure," but what he does not understand is that the pressure is deserved from a student perspective. Too often, especially in Tonkin's case, presidents forget the views of students. That is why the student media are on campus in the first place. Yes, they are there for training and a learning experience, but even more, student news clubs are operating on behalf of the opinions of the students. Students have every right to expect

their president to explain why they lost their workstudy jobs and why Lincoln will not be running any programming of interest to them.

In wrapping up our conversation, Tonkin finally did try to manipulate me in a manner that would have been much more effective if he had used this strategy throughout, rather than yelling at me earlier. He said, "I had hoped we would be able to work together this year." But then he added something that truly revealed his view of student newspapers. He said he still hoped that we could "go out and find nice little news stories." This was fairly subtle, but it was an obvious attempt to influence the direction of the newspaper, its news and editorial content.

When I wrote this paper a year ago, the trend in censorship was toward these subtle, high-pressure meetings. My current research, however, is finding this to be changing. The stealing and even burning of student newspapers is becoming quite popular across the nation.

The SPLC now lists the theft of campus newspapers as the top threat to the campus press (Garneau 43). There were 38 instances of thefts of free student newspapers reported to the SPLC in the 1993-94 academic year. Twelve cases involved student government members stealing issues that covered elections and public affairs topics, ten involved minority students who were offended by a forthcoming article, often an editorial, and the rest ranged from people (students, staff, faculty, etc.) trying to avoid distribution of a story detailing their involvement in a crime to administrators fearing negative publicity to those reasons that remain unknown (Culver, *Thefts* 34). In the 1992-93 academic year, there were approximately 20 instances of thefts. Prior to that year, the average was between three and four instances of thefts reported to the SPLC (Koster 19).

Stein titled her article "Stealing and trashing student newspapers is current campus craze." The reason the incidents seem to be increasing is that there is no consequence for stealing free newspapers. Mark Goodman, director of the SPLC, said that it is difficult to show criminal intent in these thefts. Police on and off campus often do not pursue suspects because the newspapers are free (Garneau 43), and a court in Louisiana dismissed a case where an editor did bring charges, calling it a "college prank" (Stein 39). Goodman blames university

administrations for the rise in thefts as well. "He says campus police and administrators often 'have so little perception of what free expression is about, they do nothing'" (Culver, *Campus* 13). Administrators and others often perceive their student newspaper as a "joke," he said, and therefore don't consider the destruction of anywhere from 50 to 16,000 newspapers "a big deal," (Culver, *Thefts* 39). Their unwillingness to follow through with judicial charges or denouncements of these acts do little to discourage them. Indeed, a prank caller to the University of Georgia's *Red & Black* student newspaper said that thefts at other universities encouraged him to steal all 16,000 copies of one of their issues because he knew that he would not be punished (Culver, *Campus* 14). Though the conservative *Dartmouth Review* was stolen numerous times from distribution sites, the school did nothing. The dean of students said that no university codes or laws were broken, and a spokesman called the paper "litter" and "abandoned property" to be dealt with as one deals with "menus and free samples of soap" (Koster 19).

But supporters of the campus press argue that these free papers do have value. Advertisers pay for space because they expect the ads to be seen; those newspapers with theft problems face a loss of advertising revenue (Koster 19). Other papers are losing money refunding advertisers and/or reprinting the thousands of issues stolen or destroyed, Goodman said (Culver, *Campus* 13). Still, critics say that you can't steal what's free, while others argue that the act of throwing the papers away is a form of free speech. Even the *Washington Post* wrote an editorial calling the works of a senator in Maryland trying to pass a law criminalizing stealing free papers a worthless pursuit (Koster 19). But it passed.

"It's un-American to trash people's point of view," said Senator Howard Denis. Denis and T.J. Mueller, circulation director of *The Washington Blade*, a gay and lesbian newspaper that was facing serious theft problems as well, used analogies to prove their point that free papers do have value. Mueller asked if the *Washington Post* was half as valuable as Baltimore *Sun* because it costs half as much. "The price of something has very little to do with its value," Mueller said. Denis likened the newspapers to the free ketchup packets at McDonald's and Burger King. It's okay to take a couple, but it would be a criminal act to take a whole box. Also, letters have no monetary worth, but it is a federal crime to steal mail (Culver, *Thefts* 39).

There have been a few other victories in the fight against the theft of free student newspapers. In 1988 at the University of Florida in Gainesville, students caught stealing a free student newspaper were convicted of theft (Culver, *Campus* 14). Two Pennsylvania State students plea-bargained charges of theft, receiving stolen property and criminal conspiracy in the summer 1993 after they were caught stealing the *Lionhearted*. They were sentenced to pay over $1,000 to the newspaper, and, at the request of the student editors, required to read Ray Bradbury's *Fahrenheit 451*, a book about firefighter instructed by authorities to burn inappropriate literature (Koster 19). At the University of Pennsylvania, where 14,000 copies of the *Daily Pennsylvanian* were stolen, the "Committee on Open Expression ruled that intent to prevent others from reading the paper violated the university's free-expression rules" (Culver, *Campus* 13). Despite this ruling, the charges were dropped after the chairperson of the committee said that some issues are educational rather than judicial and a special judicial officer assigned to the case recommended no further disciplinary action, according to a member of the *Daily Pennsylvanian* staff, reading from a *Daily Pennsylvanian* article published in September of 1993.

Few student editors consider legal action, Goodman said. Staff turnover and time constraints contribute to this, but he said that court action is necessary to putting an end to the increase in thefts and burnings (Culver, *Campus* 14). Pat McKeand, advisor to the Indiana University *Sagamore* suggests posting notices that the first copy of the newspaper is free but that the rest are $5 each; even 25 cents is enough, Goodman said. The other option may be a civil lawsuit (Stein 39).

One student editor was called and told in advance that her newspaper was going to be stolen. She convinced the caller that reaction to the editorial he did not want published "would be swift" and that he should instead let it promote debate (Culver, *Campus* 15). Other editors encourage dissent through the pages of the newspaper rather than the theft of it, such as Jodi Cohen of the *Badger Herald* at the University of Wisconsin-Madison. But as Gregory Pavlik will tell you, sometimes an issue containing an editorial calling for debate is stolen (Culver, *Campus* 13). Finally, Stephen Glass, executive editor of the *Daily Pennsylvanian* said that the

attacks coming from minority students are ironic because they need free expression the most. He also pointed out that by stealing that issue in protest of previous columns about affirmative action and Martin Luther King Jr., the thieves prevented an article by a black student about Marge Schott's racist comments from being read (Culver, *Campus* 15). Goodman said that the readers are the real victims in these situations (Culver, *Thefts* 39).

Several University of California-San Diego student newspapers filed complaints with their university administration when they discovered the grounds crew trashing copies of their newspapers, even on the first day of delivery. The university said that the crews were only throwing away outdated issues. The editors of the various papers, however, said that there have been problems in the past between the newspapers and the administration. Paul McMasters, writing for *Editor & Publisher*, calls this type of practice a "new version of book-burning," (48).

The *Informer* had a similar experience last year. We also do not have a clear-cut policy for the removal of old newspapers, but since I delivered the newspaper, I would also removed left over issues when I put out the new edition. In other words, Tonkin, nor any other university administrator, had ever cleaned up after me. At Lincoln Theater, however, there is plenty of room for the display of several weeks' issues, and the employees there took advantage of this fact by displaying old copies of the *Informer* with the controversial Lincoln Theater cutbacks stories on the front page. On Parents' Weekend, President Tonkin and the former Vice President for Student Affairs and Dean of Students entered the lobby of Lincoln Theater and saw these old issues. They grabbed the copies of those two issues from the rack and threw them into the lobby's garbage can. One employee said that they made a scene, and she feared that they were going to reprimand her. Fortunately, they did not. Tonkin, when questioned, maintained that he too was simply throwing away outdated issues. However, several other outdated issues were in the rack, and they were left behind. In response, the *Informer* ran a political cartoon depicting the pair throwing out these issues, which received no reaction from either administrator.

Mark Goodman, executive director of the SPLC, said that although "More students are calling to report editors being fired, articles and news programs being censored, advisers being

transferred, publications being confiscated, funds being cut and subpoenas being threatened," today's student journalists are more willing to fight for their rights ("Keeping Free" 1).

Some cases do get to the courtroom. Although the *Hazelwood* decision was a blow to the student press, other student organizations are winning their battles. At the University of Southwestern Louisiana in Lafayette, a yearbook editor was not reappointed to the post for a second year after two photographs he ran in the 1991 yearbook stirred up controversy. After negotiations broke down, the American Civil Liberties Union (ACLU) filed suit on behalf of the editor, Jeffrey Gremillion. The faculty committee that makes the nomination for yearbook editor had indeed nominated Gremillion to a second term, and this committee had been consulted about one of the photos, which accompanied an article about sex on campus. The picture showed a mostly naked couple, the woman partially hidden behind the man, to whom she was feeding a few strands of spaghetti. The photo was deliberately produced with a grainy texture so that it would not be offensive. The second photograph was not expected to be controversial. It accompanied an article about how the Persian Gulf War affected the campus and featured the school's bulldog mascot, with yellow ribbons around its neck, sitting on an American flag.

According to Gremillion's lawyer, "the university cannot take punitive measures against the editor of a student publication for the content of that publication unless the content is not constitutionally protected, such as pornography," (Buckman, *Ousted yearbook* 35). He also said that there is case law distinguishing the freedom of college press as more open than that for high schools, (35). Gremillion won the lawsuit and was awarded the back pay he would have made as the yearbook editor. He did not, however, receive any additional compensation because he did not seek it. The settlement was reached out of court.

Although the decision is effective only in Western Louisiana, Gremillion said, "It's important that the news gets out and that college and university students see it. This was one attempt by college administrators to exert control, and it failed," (Buckman, *Ousted Louisiana* 16).

Many communication journals and (obviously) SPLC packets focus on other ways around the *Hazelwood* decision for high school and college journalists. They also stress prevention. School district policies can grant students more freedom than allowed under *Hazelwood*. (SPLC, *Cases* 19). A ruling by the New York Commissioner of Education in 1989, *Brenner v. Northport High School of Long Island*, found that the school's policies in regard to the student publication set aside the *Hazelwood* decision because it granted more freedom to the student press (19). By establishing guidelines for a free student press, boards of education can prevent a principal from exercising prior review or any other forms of censorship it chooses. In Pennsylvania, departments of education do protect student rights (SPLC, *Complete Guide* 4).

State laws can also protect student journalists. While states are required to enact laws granting citizens the same amount of rights and freedoms guaranteed by federal law, no statute prevents a state from giving its residents *more* freedom than federal laws provide (Taglarieni 6). As mentioned, the California Education Code already contained a stipulation that student journalists were to retain editorial control of their publications prior to the *Hazelwood* ruling, making the Supreme Court ruling null and void in California. Recently, however, California faced a set back. Schools in the state can censor foul language. The Education Code does contain a section stating that profanity can be "controlled in student publications, even if not technically obscene, if school officials deem it a violation of 'professional standards of English and journalism'" ("California schools" 55). If words are not allowed in the local newspapers, they are not allowed in California school papers.

While this may not seem like a limit on the freedom previously enjoyed in California, the Fifth District Court of Appeal also decided that the California Constitution permits prior restraint because school publications are "limited" forums of student expression and that teaching students not to use profanity is a "legitimate pedagogical concern" (55), phrases used in the *Hazelwood* decision. Ironically, this case, which now applies to student publications, was based on a television production class in which a student developed and produced a script about a dysfunctional family, using dialogue that contained several "swear words."

Massachusetts, Iowa, Colorado, and Kansas protect student freedom of expression with laws and two New Jersey cases revealed instances where *Hazelwood* does not apply (SPLC, *Complete Guide* 4). "Legitimate pedagogical concerns" were not upheld in the Desilets case in which a junior high school newspaper was censored for running reviews of two R-rated movies. In the second case, the court effectively said that *Hazelwood* was not a requirement to censor. A teacher claimed that school officials should have censored a high school yearbook in which two photos showing her with a male teacher were captioned with phrases that intimated a relationship between the two. The court ruled that the parody was obvious (Taglarieni 7).

Many articles are calls for educators to realize that *Hazelwood* does not mean that censorship practices *should* be established. Marc Abrams' article "Don't Mess with The Student Press" is subtitled "Just because you can exercise prior restraint on the student press doesn't mean you should" (1). The *Burch v. Barker* ruling prohibits prior review/restraint of newspapers and other student publications that are not affiliated with the school (Abrams 32). The freedom accorded to "underground" newspapers attracts students considering journalism careers, Abrams argues. Although the official student newspaper may look better on a college application, the restrictions of that outlet may lead many students to abandon this resource in favor of one with the freedom they hope to one day exercise daily. This freedom, however, does not teach responsibility, something Abrams believes an advisor or journalism teacher could relate through the use of an official student newspaper. Abrams also raises the issue of liability. If a school censors its student newspaper, the school becomes liable for everything printed in the pages. If student editors are given control, they are the ones named in libel and other lawsuits (34).

Florida's Dade County School District established a policy prohibiting censorship and prior review; it is the first to expressly ban these actions (Jones 34). The SPLC claims that between 100 and 200 other school boards have established greater freedoms for student journalists than *Hazelwood* allows. As Goodman said, "Every major national organization of journalism educators in the country has said that censorship in and of itself is an educationally unsound policy" (Jones 34).

The third way the SPLC proposes student journalists prevent clashes with school administrators over censorship is to include in their policies a phrase that establishes the publication as a "public forum for student expression." Another safeguard is to include a stipulation that the student editors retain the final approval of all content in the publication. These two factors are what ruled the student newspaper at East Hazelwood High School "censurable." If other publications do not fit these requirements, *Hazelwood* will not apply to them; *Tinker* will.

Communication is supposed to be the answer, but if communication continues to be as negative and power-related as my personal examples and the examples I found in my research, the student press will continue to be at the mercy of administrators. The SPLC is one organization that can help the student press exert their rights. The ACLU is another. Student journalists need to be made more aware of their options so that they do not need to be afraid the next time a controversial issue arises.

The mainstream press enjoys rights and freedoms guaranteed by the Constitution. Yet those who will one day operate within these freedoms are denied them as they are studying them. Student journalists are restricted by their college administrators, high school principals, and student governments. There is often no recourse within the institution to fight censorship, leaving the courtroom the only place where these students can challenge these restraints. Realistically, however, this is not always a viable option for young adults. And it does not guarantee success, as evidenced by the *Hazelwood* decision.

Schools and colleges teach students about journalistic freedoms but do not extend those "rights" to the students. Controversy does arise on college campuses and in high school classrooms. Educational facilities have long been the sites of debate and, in the past, have encouraged the questioning of the status quo. Without the same freedoms guaranteed to professional journalists, student journalists cannot truly fulfill their central roles in discussing such debates and inquiries. And what will the mainstream press become once journalists accustomed to censorship are running it?

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